



CITY OF PHILADELPHIA

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May 1, 2014

Ms. Joyce Epps
Department of Environmental Protection
Bureau of Air Quality
Rachel Carson Building
400 Market Street, P. O. Box 8468
Harrisburg, PA 17105-8468

Dear Ms. Epps:

On December 13, 2013 (78 FR 75902), the U.S. Environmental Protection Agency (EPA) conditionally approved Philadelphia's 1997 8-hour ozone Reasonably Available Control Technology (RACT) demonstration provided in the 2006 and 2010 Pennsylvania State Implementation Plan (SIP) revisions, based upon a commitment from Philadelphia Air Management Services (AMS) to submit additional SIP revisions to provide source-specific RACT determinations for certain major sources of VOC and NOx in Philadelphia and a certification that previously adopted source-specific RACT controls approved by EPA in the Pennsylvania's SIP under the 1-hour ozone National Ambient Air Quality Standards (NAAQS) for the remaining sources in Philadelphia County (as listed in 40 CFR 52.2020(d)(1)) continue to adequately represent RACT for the 1997 8-hour ozone NAAQS.

To fulfill that commitment, AMS is submitting the 1st of several SIP revisions to meet the 1997 8-hour ozone RACT. AMS is providing an updated RACT determination / RACT plan approval for seven heaters at Philadelphia Energy Solutions Refining and Marketing LLC (PES). Attached with this letter is a CD that contains the following documentation:

Description	File Name
RACT Statement of Basis	PES 7 Heaters -12195 RACT Statement of Basis.pdf
RACT Plan Approval Application	PES 7 Heaters - RACT Plan Approval Application REDACTED OCR.pdf
Public Notice in newspaper	PES 7 Heaters - Daily News Public Notice.pdf
Public Notice proof of publication	PES 7 Heaters - Daily News Proof Of Publication 121213600.pdf

Public Notice in PA Bulletin	PES 7 heaters - PA Bulletin 20131214.pdf
Notification to neighboring states	PES 7 Heaters - Notification to Neighboring States.pdf
Comment response document	PES 7 Heaters - Comment Response Document.pdf
Public hearing transcript	PES 7 heaters - Public Hearing Official transcript.pdf
RACT Plan Approval	PES 7 Heaters - RACT Plan Approval.pdf
Plan Approval	PES 7 Heaters - Plan Approval.pdf
SIP revision link on AMS website to meet PA ACT 27	SIP revision link on AMS website to meet PA ACT 27.txt

The public comment period for this SIP Revision took place from December 14, 2013 to January 13, 2014. AMS received comments from William O'Sullivan, Director, Division of Air Quality, New Jersey Department of Environmental Protection.

AMS followed all of the applicable procedural requirements of the Commonwealth's laws and constitution in conducting and completing the adoption/issuance of the SIP revision. We request that the Pennsylvania Department of Environmental Protection approve this revision and forward it to EPA Region III with a recommendation for approval.

Sincerely,



Thomas Huynh
Director

Cc: Kirit Dalal, PADEP
Christina Fernandez, EPA Region III

Enclosure